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### REMARKS

Claims 1-26 are pending in this application.

The Office action rejects claims 18-23 under 35 U.S.C. 112, second paragraph. Claims 18 and 21 are correspondingly amended herein. This amendment adds no new matter and does not require an additional search.

The Office action rejects claims 1-2, 6, 9-10, and 14 under 35 U.S.C. 102(e) over Tuzhilin (USP 6,236,978). The applicants respectfully traverse this rejection.

The Examiner's attention is requested to MPEP 2131, wherein it is stated: "A claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The *identical invention* must be shown in as *complete detail* as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, upon which claims 2-8 depend, specifically claims a processor that generates at least two sets of predictions, and combines the predictions by weight-averaging corresponding predictions from each of the two sets.

Claim 9, upon which claims 10-17 depend, specifically claims a method that includes generating at least two sets of predictions, and combining the predictions by weight-averaging corresponding predictions from each of the two sets.

The applicants respectfully maintain that Tuzhilin does not teach generating two sets of predictions and weight-averaging the predictions from the two sets.

The Office action asserts that, because Tuzhilin's system can be used to generate different sets of predictions, such as predictions for restaurants, predictions for products, and so on, then Tuzhilin can be said to generate at least two sets of predictions. Assuming in argument that these different sets of predictions correspond to the applicants' claimed at least two sets of predictions, the applicants respectfully note that Tuzhilin does not teach combining such sets of predictions by weight-averaging the predictions. The

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applicants further maintain that a weight averaging of two different sets of predictions, such as a prediction of restaurants and a prediction of products, would be meaningless, because one cannot meaningfully weight average a prediction for a restaurant with a prediction for a product.

Because Tuzhilin does not teach generating at least two sets of predictions, and combining the predictions by weight-averaging corresponding predictions from each of the two sets, as specifically claimed in each of claims 1 and 9, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 1-2, 6, 9-10, and 14 under 35 U.S.C. 102(e) over Tuzhilin.

The Office action rejects claims 1-4, 6, 9-12, and 14 under 35 U.S.C. 102(e) over Hendricks et al. (USP 6,408,437, hereinafter Hendricks). The applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-8 depend, specifically claims a processor that generates at least two sets of predictions from sets of profile data, and combines the predictions by weight-averaging corresponding predictions from each of the two sets.

Claim 9, upon which claims 10-17 depend, specifically claims a method that includes generating at least two sets of predictions from sets of profile data, and combining the predictions by weight-averaging corresponding predictions from each of the two sets.

The applicants respectfully maintain that Hendricks does not teach generating two sets of predictions and weight-averaging the predictions from the two sets.

The Office action asserts that, because Hendricks allows a user to select different sets of criteria in FIGs. 11a-e, two or more sets of predictions are generated. The applicants respectfully note that Hendricks specifically teaches the generation of one set of selections 1174 in FIG. 11c, based on multiple sets of criteria 11a-d. The applicants respectfully maintain that the user's preferences cannot be said to correspond to sets of predictions based on profile data. The applicants further maintain that Hendricks' predictions 1174 are not the result of weight-averaging corresponding predictions from two or more sets of predictions, as specifically claimed by the applicants.

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Because Hendricks does not teach generating at least two sets of predictions from profile data, and combining the predictions by weight-averaging corresponding predictions from each of the two sets, as specifically claimed in each of claims 1 and 9, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 1-4, 6, 9-12, and 14 under 35 U.S.C. 102(e) over Hendricks.

The Office action rejects claims 5, 7-8, 13, and 15-26 under 35 U.S.C. 103(a) over Hendricks and Bergh (USP 6,112,186). The applicants respectfully traverse this rejection, based on the remarks above regarding Hendricks, and based on the following remarks.

Each of the applicants' independent claims 1, 9, 18, and 21, upon which each of the rejected claims depend, includes generating at least two sets of predictions from sets of profile data, and combining the predictions by weight-averaging corresponding predictions from each of the two sets.

As noted above, Hendricks teaches the generation of a single set of predictions/selections. In like manner, Bergh teaches generating a set of predictions/recommendations based on different users' ratings of items. Bergh does not teach generating at least two sets of predictions and weight-averaging corresponding predictions from each of the at least two sets.

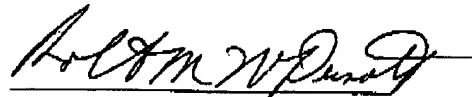
Because neither Hendricks nor Bergh, individually or collectively, teach or suggest generating at least two sets of predictions from sets of profile data, and combining the predictions by weight-averaging corresponding predictions from each of the two sets, as specifically claimed in each of the applicants' independent claims, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 5, 7-8, 13, and 15-26 under 35 U.S.C. 103(a) over Hendricks and Bergh.

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In view of the foregoing, the applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the present application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Esq.  
Reg. No. 41,508  
804-493-0707